

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SOUNDEXCHANGE, INC.,)	
)	
Plaintiff)	
)	
v.)	No. 1:23-cv-01083-PTG-JFA
)	
SIRIUS XM RADIO INC.,)	
)	
Defendant.)	

**DEFENDANT SIRIUS XM RADIO INC.'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE OR, IN THE
ALTERNATIVE, TO TRANSFER VENUE**

Defendant Sirius XM Radio Inc., by and through undersigned counsel, respectfully moves the Court to dismiss Plaintiff's Complaint in this action pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(3), or, in the alternative, transfer this action pursuant to 28 U.S.C. § 1404(a) to the United States District Court for the Southern District of New York or, in the alternative, to the United States District Court for the District of Columbia. The grounds for the motion are set forth in the accompanying memorandum of law. A proposed order is submitted herewith.

Dated: September 22, 2023

Respectfully submitted,

By: /s/ Craig C. Reilly

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